

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION,

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:
Civil File No. 18-296 (MJD/KMM)

**PLAINTIFFS' MOTION FOR CLASS CERTIFICATION,
APPOINTMENT OF CLASS REPRESENTATIVES AND
APPOINTMENT OF CLASS COUNSEL**

Court-appointed Lead Plaintiff, the State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund ("Oregon"), and named plaintiff Fernando Alberto Vildosola, as trustee for the AUFV Trust U/A/D 02/19/2009 ("Vildosola," and collectively with Lead Plaintiff, "Plaintiffs"), by their counsel, hereby move this Court for an entry of an Order in the above-captioned action:

- (1) certifying pursuant to Rule 23 of the Federal Rules of Civil Procedure of all persons or entities that purchased or otherwise acquired publicly traded CenturyLink, Inc. ("CenturyLink") common stock or 7.60% Senior Notes due September 15, 2039 during the period between March 1, 2013 to July 12, 2017, inclusive, and who were damaged thereby;
- (2) appointing Oregon and Vildosola as Class Representatives;

- (3) appointing Bernstein Litowitz Berger & Grossmann LLP and Stoll Berne Lokting & Shlachter P.C. as Class Counsel.

This Motion is based on this Notice of Motion, the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Class Certification and Appointment of Class Representatives and Class Counsel, the Declaration of Michael D. Blatchley with supporting exhibits A to E, including the Expert Report of Michael L. Hartzmark, Ph.D., the papers and pleadings filed in this action, and such further argument and matters as may be offered at the time of hearing on this Motion.

Dated: January 21, 2020

Respectfully submitted,

/s/ Michael D. Blatchley

John C. Browne, NYS Bar No. 3922747

Michael D. Blatchley, NYS Bar No. 4747424

Michael M. Mathai, NYS Bar No. 5166319

Julia Tebor, NYS Bar No. 5119284

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

1251 Avenue of the Americas

New York, New York 10020

Telephone: (212) 554-1400

Facsimile: (212) 554-1444

johnb@blbglaw.com

michaelb@blbglaw.com

michael.mathai@blbglaw.com

Julia.tebor@blbglaw.com

Keith S. Dubanevich, OSB No. 975200

Timothy S. DeJong, OSB No. 940662

Keil M. Mueller, OSB No. 085535

**STOLL STOLL BERNE LOKTING &
SHLACHTER P.C.**

209 SW Oak Street, Suite 500

Portland, OR 97204

Telephone: (503) 227-1600

Facsimile: (503) 227-6840
kdubanevich@stollberne.com
tdejong@stollberne.com
kmueller@stollberne.com

*Special Assistant Attorneys General and Counsel
for Lead Plaintiff the State of Oregon by and
through the Oregon State Treasurer and the
Oregon Public Employee Retirement Board, on
behalf of the Oregon Public Employee Retirement
Fund and Plaintiff Fernando Alberto Vildosola,
as trustee for the AUFV Trust U/A/D 02/19/2009,
and Lead Counsel for the Class*

Richard A. Lockridge, MN No. 64117
Gregg M. Fishbein, MN No. 202009
Kate M. Baxter-Kauf, MN No. 392037
LOCKRIDGE GRINDAL NAUEN P.L.L.P.
100 Washington Avenue S, Suite 2200
Minneapolis, MN 55401
Telephone: (612) 596-4044
Facsimile: (612) 339-0981
ralockridge@locklaw.com
gmfishbein@locklaw.com
kmbaxter-kauf@locklaw.com

Liaison Counsel for Plaintiffs